

**IN THE UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
Richmond Division**

IN RE:		}	
		}	Case No. 19-36381-KRH
Tawanda Fowler		}	
		}	
		}	Chapter 13
		}	
	Debtor	}	
Address:	5465 Brandon Bluff Way		
	Richmond, VA 23223		
SSN:	xxx-xx-8858		

NOTICE OF MOTION

Tawanda Fowler, (“Debtor”), by counsel, has filed a Motion to Incur Debt, Motion to Expedite and Motion to Shorten Notice Period.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case.

If you do not want the court to grant the relief sought in the motion, or if you want the court to consider your views on the motion, then on or before you or your attorney must:

- ✓ File with the court, at the address shown below, a written request for a hearing [or a written response pursuant to Local Bankruptcy Rule 9013-1(H)]. If you mail your request for hearing (or response) to the court for filing, you must mail it early enough so the court will receive it on or before the date stated above.

**Clerk of Court
United States Bankruptcy Court
701 E. Broad Street, Room 4000
Richmond, VA 23219**

Massie Law Firm, PC
Joseph Massie, III, Esquire (Bar No. 35472)
115 N. 1st Street
Richmond, VA 23219
(804) 644-4878 (T)
(804) 644-4874 (F)
jmassie@massielawfirm.com

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You must also mail a copy to:

Joseph Massie, III
115 N. 1st Street
Richmond, VA 23219-2125

- ✓ **Attend a hearing scheduled for March 25, 2020 at 12:00 A.M. at Judge Huennekens at 701 E. Broad Street, Room 5000, Richmond, VA 23219.**

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the motion and may enter an order granting that relief.

/s/: Joseph Massie, III
Joseph Massie, III
115 N. 1st Street
Richmond, VA 23219-2125
(804) 644-4878 (T)
(804) 644-4874 (F)

CERTIFICATE OF SERVICE

I hereby certify that pursuant to Local Rule 9022-1, on March 19, 2020, the foregoing **Notice of Motion** has been served on and/or endorsed by all necessary parties.

March 19, 2020

RESPECTFULLY SUBMITTED

Tawanda Fowler

By: /s/: Joseph Massie, III
Joseph Massie, III
115 N. 1st Street
Richmond, VA 23219-2125
(804) 644-4878 (T)
(804) 644-4874 (F)

Massie Law Firm, PC
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Chapter 13

Acceptance Now
Attn: Bankruptcy
5501 Headquarters Drive
Plano, TX 75024

Comenity Bank/Victoria Secret
Attn: Bankruptcy
Po Box 182125
Columbus, OH 43218

Comenity bank/New York
Attn: Bankruptcy
Po Box 18215
Columbus, OH 43218

Department of Taxation
P.O. Box 2369
Richmond, VA 23218

Department Store National Bank/Macy's
Attn: Bankruptcy
9111 Duke Boulevard
Mason, OH 45040

First Electronic Bank
Attn: Bankruptcy
Po Box 521271
Salt Lake City, UT 84152

IC System, Inc
Attn: Bankruptcy
Po Box 64378
Saint Paul, MN 55164

Massie Law Firm, PC
Joseph Massie, III, Esquire (Bar No. 35472)
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IN RE:

Tawanda Fowler

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Chapter 13

IRS
P.O. BOX 7346
Philadelphia, PA 19101

Lendmark Financial
Attn: Bankruptcy
1735 N Brown Rd, Ste 300
Lawrenceville, GA 30043

Massie Law Firm, PC
Joseph Massie, III, Esquire (Bar No. 35472)
115 N. 1st Street
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Chapter 13

**IN THE UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
Richmond Division**

In re: Tawanda Fowler

Case Number 19-36381-KRH

Chapter 13

Debtor

MOTION TO EXPEDITE HEARING

COMES NOW, Tawanda Fowler, the Debtor, by Counsel, and offer the following in support of his Motion **to Expedite Hearing** on the **Motion for Authority to Incur Indebtedness**:

1. On December 6, 2019, Debtor filed in the Honorable Court a petition for relief under Chapter 13 of Bankruptcy Code 11 USC § 1301 **et seq.**
2. Debtor seeks permission to have an Expedited Hearing on the **Motion for Authority to Incur Indebtedness**.
3. That an expedited hearing on the Motions are necessary for the following reason: **Debtor does not have transportation for work.**
4. An expedited hearing is necessary under the circumstances and creditors and parties in interest will not be prejudiced by such expedited hearing being granted.

WHEREFORE, the Debtor respectfully request this Honorable Court to schedule a hearing to be heard on an expedited basis to consider the **Motion for Authority to Incur Indebtedness** and for such other and further relief as the Court deems proper.

March 19, 2020

RESPECTFULLY SUBMITTED,

Tawanda Fowler

By: /s/: Joseph Massie, III

Joseph Massie, III

115 N. 1st Street

Richmond, VA 23219-2125

(804) 644-4878 (T)

(804) 644-4874 (F)

Massie Law Firm, PC

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IN RE:

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Case No. 19-36381-KRH

Tawanda Fowler

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Chapter 13

**IN THE UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
Richmond Division**

In re: Tawanda Fowler

Case Number 19-36381-KRH

Chapter 13

Debtor

CERTIFICATION REGARDING REQUEST FOR EXPEDITED HEARING

In support of the attached request for an expedited hearing as required by Local Rule 9013-1(N), I hereby certify that:

1. I have carefully examined the matter and concluded that there is a true need for an emergency hearing.
2. I have not created the emergency through any lack of due diligence, and
3. I have made a *bona fide* effort to resolve the matter without hearing.

March 19, 2020

RESPECTFULLY SUBMITTED,
Tawanda Fowler

By: /s/: Joseph Massie, III
Joseph Massie, III
115 N. 1st Street
Richmond, VA 23219-2125
(804) 644-4878 (T)
(804) 644-4874 (F)

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IN RE:

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Case No. 19-36381-KRH

Tawanda Fowler

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Chapter 13

CERTIFICATE OF SERVICE

I hereby certify that pursuant to Local Rule 9022-1, on March 19, 2020, the foregoing **Motion to Expedite Hearing** has been served on and/or endorsed by all necessary parties.

March 19, 2020

RESPECTFULLY SUBMITTED

Tawanda Fowler

By /s/: Joseph Massie, III

Joseph Massie, III

115 N. 1st Street

Richmond, VA 23219-2125

(804) 644-4878 (T)

(804) 644-4874 (F)

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**IN THE UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
Richmond Division**

In re: Tawanda Fowler

Case Number 19-7-36381-KRH

Chapter 13

Debtor

MOTION TO SHORTEN NOTICE PERIOD

COMES NOW, Tawanda Fowler, (“the Debtor”), by Counsel, and file this Motion to Shorten the Notice Period for the Motion for Authority to Incur Indebtedness pursuant to 11 USC §364(a) and 1304, Federal Rules of Bankruptcy Procedure 4001(c) and 9013, and Local Bankruptcy Rules 9013-1. In support thereof, Debtor respectfully states the following:

Jurisdiction

1. This court has exclusive jurisdiction over this matter pursuant to 28 USC §1334.
2. This proceeding is a core proceeding under 28 USC §157(b)(2)(A)(B)(K) and (O).
3. Venue is proper pursuant to 28 USC §1409.

Facts

4. On March 19, 2020, the Debtor filed in the Honorable Court a Motion for Authority to Incur Debt.
5. Debtor seeks to shorten the notice period for the **Motion for Authority to Incur Indebtedness** from twenty-one (21) days to six (6) days.

WHEREFORE, the Debtor prays that this Court enter an Order shortening the notice period for the **Motion for Authority to Incur Indebtedness**

March 19, 2020

RESPECTFULLY SUBMITTED,
Tawanda Fowler

By: /s/: Joseph Massie, III
Joseph Massie, III

Massie Law Firm, PC
Joseph Massie, III, Esquire (Bar No. 35472)
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Richmond, VA 23219
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(804) 644-4874 (F)

CERTIFICATE OF SERVICE

I hereby certify that pursuant to Local Rule 9022-1, on March 19, 2020, the foregoing **Motion to Shorten Notice Period** has been served on and/or endorsed by all necessary parties.

March 4, 2020

RESPECTFULLY SUBMITTED
Tawanda Fowler

By /s/: Joseph Massie, III
Joseph Massie, III
115 N. 1st Street
Richmond, VA 23219-2125
(804) 644-4878 (T)
(804) 644-4874 (F)

Massie Law Firm, PC
Joseph Massie, III, Esquire (Bar No. 35472)
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Chapter 13

**IN THE UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
Richmond Division**

In re: Tawanda Fowler

Case Number 19-36381-KRH

Chapter 13

Debtor

MOTION FOR AUTHORITY TO INCUR INDEBTEDNESS

COME NOW, the Debtor, Tawanda Fowler, by counsel, and in support of his request Motion for Authority to Incur Indebtedness, states as follows:

1. The Debtor is requesting authority to incur indebted with, for the purchase of **2020 Nissan Altima** or like vehicle in the approximate amount not to exceed **\$23,712.97**, and with an interest rate not to exceed **17.99%, 6 years (72 months)** with monthly payments of **\$545.00-\$565.00 per month**.
2. Said purchase is necessary as the Debtor is in need of vehicle to drive to work.
3. Said indebtedness will not impair the Debtor's ability to comply with the terms of Chapter 13 Plan.

WHEREFORE, the Debtor requests an Order authorizing them to incur said indebtedness and for such other relief as the Court may deem appropriate.

March 19, 2020

RESPECTFULLY SUBMITTED,
Tawanda Fowler

By: /s/: Joseph Massie, III
Joseph Massie, III
115 N. 1st Street
Richmond, VA 23219-2125
(804) 644-4878 (T)
(804) 644-4874 (F)

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Tawanda Fowler

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CERTIFICATE OF SERVICE

I hereby certify that pursuant to Local Rule 9022-1, on March 19, 2020, the foregoing **Motion for Authority to Incur Indebtedness** has been served on and/or endorsed by all necessary parties.

March 19, 2020

RESPECTFULLY SUBMITTED

Tawanda Fowler

By /s/: Joseph Massie, III

Joseph Massie, III

115 N. 1st Street

Richmond, VA 23219-2125

(804) 644-4878 (T)

(804) 644-4874 (F)

Debtor

Tawanda Fowler

5465 Brandon Bluff Way

Richmond, VA 23223

Trustee

Suzanne E. Wade

7202 Glen Forest Drive

Richmond, VA 23226

Creditor

Hyman Bros.

11841 Midlothian Turnpike

Midlothian, VA 23113

Massie Law Firm, PC
Joseph Massie, III, Esquire (Bar No. 35472)
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